Anti-Bribery & Corruption Policy

1. Purpose

Excalon is committed to the prevention, deterrence and detection of bribery and corruption and have zero-tolerance towards this. It is our policy to conduct all our business activities in an honest and ethical manner.

We are bound by the laws of the UK, including the Bribery Act 2010 which came into force in July 2011, and as an organisation we take these legal responsibilities very seriously.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation.

This policy is therefore designed to ensure Excalon has the right procedures in place to prevent bribery and corruption and shows our commitment to take appropriate action should we suspect any such activity has taken place.

2. Reference Documents

- Bribery Act 2010
- Excalon Ethics Policy (HR015-Ethics)

3. Policy

This policy provides a framework to enable Excalon's employees to understand and implement arrangements enabling compliance with this policy and related laws and the Bribery Act. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach. Excalon does not and will not:

- Pay bribes or offer improper inducements to anyone for any purpose
- Accept bribes or improper inducements
- Engage indirectly in or otherwise encourage bribery.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the organisation or under its control. All employees are required to avoid activity that breaches this policy.

What is Bribery?

The general definition of bribery is 'giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so'. This could include seeking to influence a decision-maker by giving extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process. (Source: Ministry of Justice)

Excalon considers it unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

Facilitation Payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Employee commitment and responsibilities

Every employee has a responsibility to help detect, prevent and report instances of bribery. If you have a concern regarding a suspected instance of bribery or corruption, please inform a manager immediately. If you are unsure whether an act constitutes bribery or corruption, you should speak to your line manager or alternatively an independent manager. We require our employees, contractors, sub-contractors, and associated partners to:

- Read, understand and comply with this policy
- Act honestly and with integrity at all times to safeguard the organisation's resources
- Comply with the spirit, as well as the letter, of the law and regulations of all jurisdictions in which the organisation operates, in respect of the lawful and responsible conduct of activities
- Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future
- Inform you line manager or senior company manager or Director as soon as possible if you are offered a bribe by a third party or are asked to make one.

As well as the possibility of civil and criminal prosecution, employees that breach this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

We reserve the right to terminate our contractual relationship with any partners, contractors or sub-contractors and all other associated parties if they breach this policy.

Organisational commitment

The Directors and Senior Leadership Team are committed to preventing bribery and foster a culture within the organisation in which bribery is never acceptable. The organisation is committed to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times
- Training/briefing all employees so that they can recognise and avoid the use of bribery
- Encouraging its employees to be vigilant and to report any suspicions of bribery, providing a suitable channels of communication and ensuring information is treated confidentially
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any associated prosecutions
- Taking appropriate disciplinary action against any individual(s) involved in bribery
- Provide information to all employees to report breaches and suspected breaches of this policy
- Include appropriate clauses in contracts to prevent bribery.

Risk Assessment

The organisation will assess the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and will be documented. It includes financial risks but also other risks such as reputational damage.

Raising a concern and protection

Excalon Ltd is committed to ensuring that everyone has a safe, reliable, and confidential way of reporting any suspicious activity. We want each employee to know how they can raise concerns.

Employees who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the repercussions. We are committed to ensuring no one suffers any detrimental treatment because of refusing to take part in bribery or corruption. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

Should an employee feel that they are suffering detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting a concern in good faith, they should immediately inform their line manager or alternative independent manager or senior manager if their line manager is implicated. Detrimental treatment includes dismissal, disciplinary action, threats or other kinds of unfavourable treatment including exclusion from meetings and activities or general poor treatment or bullying.

A formal grievance may also be submitted under the Company grievance policy (Reference 'HR006-Grievance')

Monitoring and review

The board will monitor the effectiveness and review the implementation of this policy, regularly to ensure it is still accurate and effective. Any changes needed will be made as soon as possible.

4. Records Management

All employees must maintain all records relevant to administering this process and procedure in line with Legislative and the company record keeping system.

5. Policy Review

The Company will monitor its policies, processes and procedures to implement changes to improve them and ensure that they comply with best practice, legislation changes and the emerging marketplace.

Version History: HR008 Anti-Bribery Policy			
Document Version	**Version Date**	**Revision Description**	**Author**
0.1	18/09/2015	Initial	Katrina Beck
0.1	19/09/2016	No Change	Katrina Beck
0.1	19/07/2017	No Change	Laura Henshaw
0.2	01/08/2018	Minor amends & formatting	Katrina Beck
0.3	16/12/2019	No change	Katrina Beck
0.3	30/06/2021	No change	Katrina Beck
0.3	08/08/2022	No change	Alison Scragg
0.3	01/09/2023	Annual Review - No Change	Katrina Beck

DISTIRUBITON LIST		
Name	**Role**	**Location**
Company Wide	Employees, contractors, sub-contractors, partners	All Offices

Signed on behalf of Excalon Ltd: _____ Kevin O'Donnell | Managing Director